

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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| IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION | MDL No. 2875 |
| THIS DOCUMENT RELATES TO ALL CASES | HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK) |

**CERTIFICATION OF DANIEL A. NIGH IN SUPPORT OF
PLAINTIFFS' BRIEF IN SUPPORT OF DAUBERT MOTION TO PRECLUDE
OPINIONS OF DEFENSE EXPERT AKHILESH NAGAICH, PH.D.**

DANIEL A. NIGH, hereby certifies as follows:

1. I am an attorney at law within the State of Florida with Nigh Goldenberg Raso & Vaughn and serve as Court-appointed Plaintiffs' co-lead counsel to the Plaintiff's side. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' brief in support of Daubert motion to preclude opinions of defense expert Akhilesh Nagaich, PH.D.
2. Attached hereto as **Exhibit 1** to the Motion is a true and accurate copy of the December 22, 2022 Expert Report of Akhilesh Nagaich, PH.d.
3. Attached hereto as **Exhibit 2** to the Motion is a true and accurate copy of the February 9, 2023 Transcript of the videotaped deposition of Akhilesh Nagaich, Ph. D.
4. Attached hereto as **Exhibit 3** to the Motion is a true and accurate copy of TORRENT-MDL2875-00072542
5. Attached hereto as **Exhibit 4** to the Motion is a true and accurate copy of the January 26, 2023 Transcript of the videotaped deposition of Steven Baertschi, Ph. D.

6. Attached hereto as **Exhibit 5** to the Motion is a true and accurate copy of USP General Notices and Requirements.

7. Attached hereto as **Exhibit 6** to the Motion is a true and accurate copy of the January 28, 2022 Valsartan Monograph.

8. Attached hereto as **Exhibit 7** to the Motion is a true and accurate copy of TORRENT-MDL2875-00131251.

9. Attached hereto as **Exhibit 8** to the Motion is a true and accurate copy of PRINSTON00304075.

10. Attached hereto as **Exhibit 9** to the Motion is a true and accurate copy of FDA Inspection Report of ZHP Facility.

11. Attached hereto as **Exhibit 10** to the Motion is a true and accurate copy of TORRENT-MDL2875-00516411.

12. Attached hereto as **Exhibit 11** to the Motion is a true and accurate copy of TORRENT-MDL2875-00007067.

**NIGH GOLDENBERG RASO
& VAUGHN, PLLC**
Attorneys for Plaintiffs

Dated: March 13, 2023

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